



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

RCH/MAM  
F. #2016R01214

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 17, 2021

By ECF

The Honorable Diane Gujarati  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Asre, et al.  
Criminal Dkt. No. 21-174 (DG)

Dear Judge Gujarati:

The government respectfully submits, pursuant to Rule 16(d)(1) of the Federal Rules of Criminal Procedure, a revised stipulated protective order addendum that limits the disclosure and use of certain materials in the above-referenced case related to reports filed with the U.S. Department of Treasury by financial institutions pursuant to the Bank Secrecy Act, 31 U.S.C. § 5311 et seq. The enclosed revised Stipulation and Addendum to Protective Order addresses revisions identified by the Court in its order dated December 13, 2021 related to the Stipulation and Addendum to Protective Order previously filed on December 8, 2021, see Dkt. No. 44.

For the reasons discussed in the government's previous submissions to the Court, see Dkt. Nos. 35, 43, the government respectfully requests that the Court so-order the attached Stipulation and Addendum to Protective Order, which has been signed by counsel for Mr. Asre and the government.

Respectfully submitted,

BREON PEACE  
United States Attorney

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cc: All Counsel (via ECF)